



Molalla Communications

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DOCKET FILE COPY ORIGINAL

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

June 30, 2014
REDACTED - FOR PUBLIC INSPECTION *Received & Inspected*

JUL 10 2014

FCC Mail Room

RE: REQUEST FOR CONFIDENTIAL TREATMENT - *Connect America Fund*, WC Docket No. 10-90;
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Request that Information Submitted to the Commission be Withheld from Public Inspection
Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality
Improvement Plan included in FCC Form 481

Confidential Financial Information - Subject to Protective Order in WC Docket Nos. 10-90,
07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket
No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Molalla Telephone Company d/b/a Molalla Communications ("Molalla Communications" or "the Company"), Study Area Code 532383, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. The Company, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's November 16, 2012 *Protective Order* in WC Docket No. 10-90 *et al.* These attachments contain competitively sensitive data that Molalla Communications maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

Five-Year Service Quality Improvement Plan

Pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA, Molalla Communications requests that the text and data extracted from its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 - Five-Year Service Quality Improvement Plan.
Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's access line counts, existing broadband capabilities, and its network investment plans through 2019 that will improve service quality for its customers.

No. of Copies rec'd 0 + 1
List ABCDE

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains information on the Company's access line counts and existing broadband capabilities as well as plans for financial investments in its network through 2019 to improve service to subscribers. This is closely guarded, privileged information that the company does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider such as a cable company. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company's access line count, its existing broadband capabilities, and its strategic plans for network investments. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection

indefinitely. Although the information reflects the Company's service improvement plans for a five year period, it would provide a very useful baseline for competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Molalla Communications seeks confidential treatment of its financial annual report pursuant to the November 16, 2012 *Protective Order* in WC Docket No. 10-90, *et al.*¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2). Molalla Communications is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan confidential submission bears the legend, "CONFIDENTIAL- NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION -SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337,03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED- FOR PUBLIC INSPECTION."

Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

This cover letter includes no confidential information and the text is the same in both the nonredacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

Linda Philpot
Authorized Representative for Molalla Telephone Company d/b/a Molalla Communications

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau,
Federal Communications Commission, (2 hardcopies of non-redacted submission)

¹ *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, *Protective Order*, DA 12-1857 (rel. Nov. 16, 2012).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	532383	Received & Inspected
<015> Study Area Name	MOLALLA TEL CO.	
<020> Program Year	2015	JUL 10 2014
<030> Contact Name: Person USAC should contact with questions about this data	Linda Philpot	
<035> Contact Telephone Number: Number of the person identified in data line <030>	5038291309 ext.	FCC Mail Room
<039> Contact Email Address: Email of the person identified in data line <030>	lphilpot@molalla.com	

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">532383OR510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">532383OR610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; padding: 2px;">532383OR1010.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	532383
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing § 54.202(a) "5 year plan" filed with the FCC?	(yes / no)	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

53238308100.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="checkbox"/>
<114>	Report how much universal service (USF) support was received	<input type="checkbox"/>
<115>	How (USF) was used to improve service quality	<input type="checkbox"/>
<116>	How (USF) was used to improve service coverage	<input type="checkbox"/>
<117>	How (USF) was used to improve service capacity	<input type="checkbox"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

<010>	Study Area Code	532383
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

[illegible]

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	14.95

See attached worksheet

<010>	Study Area Code	532383
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5034291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

[illegible]

<010>	Study Area Code	532383
<015>	Study Area Name	MOLALLA TEL. CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com
<810>	Reporting Carrier	Molalla Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	532383
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

**[1100] No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	532303
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

Please check this box to confirm no terrestrial backhaul
<1120> options exist within the supported area pursuant to § 54.313(G) ☒

Please check this box to confirm the reporting carrier offers
<1130> broadband service of at least 1 Mbps downstream and 256 kbps
upstream within the supported area pursuant to § 54.313(G) ☒

(1200) Terms and Condition for Lifeline Customers

Lifeline

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	532383
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.molalla.com/publicnotices>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

[2000] Price Cap Carrier Additional Documentation**Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	592383
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification (47 CFR § 54.313(b)(1))
 <2011> 3rd Year Certification (47 CFR § 54.313(b)(2))

☐
☐
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

<2012> 2013 Frozen Support Certification
 <2013> 2014 Frozen Support Certification
 <2014> 2015 Frozen Support Certification
 <2015> 2016 and future Frozen Support Certification

☐
☐
☐
☐
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

<2016> Certification Support Used to Build Broadband

☐
Connect America Phase II Reporting (47 CFR § 54.313(e))

<2017> 3rd year Broadband Service Certification
 <2018> 5th year Broadband Service Certification
 <2019> Interim Progress Certification

☐
☐
☐

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

[3000] Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0866/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	532387
<015> Study Area Name	McJannet TEL CO
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035> Contact Telephone Number - Number of person identified in data line <030>	5028291209 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lphilpot@mcjannet.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) **Progress Report on 5 Year Plan**
 Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313(f)(1)(i), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) ☐ (Yes/No)
 (3014) If yes, does your company file the RUS annual report ☐ (Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☒
 (3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

532383OR3017.pdf, 532383OR3017.xltx

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, is your company audited? ☐ (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐
 (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐
 (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐
 (3023) Underlying information subjected to a review by an independent certified public accountant ☐
 (3024) Underlying information subjected to an officer certification. ☐
 (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	532383
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: MOLALLA TEL CO.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/30/2014
Printed name of Authorized Officer: Terry Simms	
Title or position of Authorized Officer: Vice President/CFO	
Telephone number of Authorized Officer: 5038291122 ext.	
Study Area Code of Reporting Carrier: 532383	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	532383
<015> Study Area Name	MOLALLA TEL CO.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035> Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	532383
<015>	Study Area Name	MOLALLA TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Linda Philpot
<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291308 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lphilpot@molalla.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	14.95

<703>

[illegible]

(710) Broadband Price Offerings
Data Collection Form

FOC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

July 2013

<010> Study Area Code 532383

<015>	Study Area Name	MCLALLA TEL CO.
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<020>	Program Year	2015
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<030> Contact Name - Person USAC should contact regarding this data Linda Philpot

<035>	Contact Telephone Number - Number of person identified in data line <030>	5038291309 ext.
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<039> Contact Email Address - Email Address of person identified in data line <030> lphilpot@molalla.com

[illegible]

The receipt of USF support, combined with other funding sources will allow Molalla Communications Company to continue to provide reliable, state-of-the-art, high-quality voice and broadband service to its XXXX rural customers. Molalla Communications Company has one wire center: MLLLORXADSO in Molalla Oregon

Molalla Communications Company anticipates that it will make the following improvements and/or upgrades to its network over the next five years:

2015 Projected Network Improvements/Upgrades				VOICE
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2015	November 2015	MLLLORXADSO	
	April 2015	June 2015	MLLLORXADSO	
	June 2015	October 2015	MLLLORXADSO	
2016 Projected Network Improvements/Upgrades				VOICE
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2016	November 2016	MLLLORXADSO	
	March 2016	May 2016	MLLLORXADSO	
	July 2016	September 2016	MLLLORXADSO	
2017 Projected Network Improvements/Upgrades				VOICE
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2017	October 2017	MLLLORXADSO	
	April 2017	June 2017	MLLLORXADSO	
	June 2017	October 2017	MLLLORXADSO	
2018 Projected Network Improvements/Upgrades				VOICE
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2018	November 2018	MLLLORXADSO	
	February 2018	April 2018	MLLLORXADSO	
	May 2018	June 2018	MLLLORXADSO	
2019 Projected Network Improvements/Upgrades				VOICE
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2019	November 2019	MLLLORXADSO	
	April 2019	June 2019	MLLLORXADSO	
	March 2019	October 2019	MLLLORXADSO	

2015 Projected Network Improvements/Upgrades				BROADBAND
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2015	November 2015	MLLORXADSO	
	June 2015	October 2015	MLLORXADSO	
2016 Projected Network Improvements/Upgrades				BROADBAND
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2016	November 2016	MLLORXADSO	
	September 2016	November 2016	MLLORXADSO	
	March 2016	July 2016	MLLORXADSO	
2017 Projected Network Improvements/Upgrades				BROADBAND
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2017	October 2017	MLLORXADSO	
	February 2017	June 2017	MLLORXADSO	
	January 2017	April 2017	MLLORXADSO	
2018 Projected Network Improvements/Upgrades				BROADBAND
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2018	November 2018	MLLORXADSO	
	January 2018	April 2018	MLLORXADSO	
	May 2018	June 2018	MLLORXADSO	
2019 Projected Network Improvements/Upgrades				BROADBAND
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
	January 2019	November 2019	MLLORXADSO	
	April 2019	June 2019	MLLORXADSO	
	January 2019	May 2019	MLLORXADSO	

Annual Reporting for High-Cost Recipients

47 C.F.R. 54.313

Molalla Communications Company

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

The Company projects that the capital expenditures, by Part 32 account, for 2015 through 2019 for the projects listed above will be as follows:

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
2110 Land & General Support					
2210 Central Office Switching					
2230 Central Office Transmission					
2410 Cable & Wire Facilities					
Total Capital Expenditures					

In addition to the above planned capital expenditures, the Company projects that it will incur the following operating expenses, by expense category, over the next five years:

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Plant Specific					
Plant Non-Specific					
Depreciation					
Customer Operations					
Corporate Operations					
Total Operating Expenses					

Response Line 510
Molalla Telephone Company dba Molalla Communications
Molalla Oregon
Study Area 532383

Service Quality Standards & Consumer Protection Rules Compliance

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) MOLALLA TELEPHONE DBA MOLALLA COMMUNICATIONS ("MOLALLA COMMUNICATIONS COMPANY") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. MOLALLA COMMUNICATIONS provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. MOLALLA COMMUNICATIONS also conducts subscriber outreach regarding CPNI by periodically placing CPNI explanation messages onto its website informing subscribers on CPNI rules and regulations as well as annual bill inserts and the local phone directory annually. In addition MOLALLA COMMUNICATIONS trains staff on Red Flag issues on an annual basis as well as train any new employees. All MOLALLA COMMUNICATIONS employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

MOLALLA COMMUNICATIONS also outlines its rates, terms, and conditions under which MOLALLA COMMUNICATIONS offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. MOLALLA COMMUNICATIONS keeps its tariffs available for public inspection at its business offices.

Response Line 610
Molalla Telephone Company dba Molalla Communications
Molalla Oregon
Study Area 532383

Functionality in Emergency Situations:

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Molalla Telephone Company meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to the Molalla Telephone central office by use of a fixed generator and batteries that provide it with up to 336 hours of emergency power. In addition, Molalla Telephone field electronics have up to 336 hours of back-up power by use of fixed generators and batteries. Molalla Telephone also has DWDM technology deployed in its core fiber optic network that is a self-healing and will automatically reroute traffic should a fiber cut occur. In addition Molalla Telephone has connectivity to the neighboring exchanges of Canby Telecom, Monitor Telephone and Colton Telephone to exchange traffic and also has connectivity to the LATA Tandem which further provides capabilities of handling traffic. Lastly, Molalla Telephone is prepared and capable of managing traffic spikes resulting from emergency situations and has developed procedures for employees to follow during emergency situations.

Response to Line 1010
Molalla Telephone Company
Study Area 532383

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Molalla Telephone Company ("MCC") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$46.96 as specified in Public Notice DA 14-384 issued on March 20, 2014. MCC's current total local end-user rate¹ of \$29.27 (which includes a local fee of \$14.95, mandated state fees of \$2.38, and mandatory extended area service charges of \$11.94) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."